

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

YOTONDA MILTON, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	Case No. 1:16-cv-10523
v.)	
)	Judge Sharon Johnson Coleman
CONFIE INSURANCE SERVICES, INC.,)	
a/k/a/CIGH SERVICES, INC.; and)	Magistrate Judge Kim
INSUREONE INDEPENDENT INSURANCE)	
AGENCY, LLC;)	
)	
Defendants.)	

JOINT MOTION FOR SETTLEMENT APPROVAL

Plaintiff Yotonda Milton and Defendants Confie Insurance Services, Inc. and InsureOne Independent Insurance Agency, by and through their respective counsel, jointly move the Court to approve the settlement agreed to by the parties and submitted to chambers for *in camera* review. In support of this Motion, the parties state as follows:

1. On November 14, 2016, Plaintiff filed a Complaint in this matter asserting claims against Defendants under the Fair Labor Standards Act, 29 U.S.C. §201, *et seq.* and the Illinois Minimum Wage Law, 820 ILCS 105/1 *et seq.* [ECF No. 1].
2. After arms-length negotiations and the exchange of substantive information, the parties herein have agreed to a compromise between them in order to avoid the expense, inconvenience, uncertainty and delay of further litigation.
3. By way of background, Plaintiff was a Team Leader and insurance Agent for InsureOne in Illinois. The Defendants agreed to provide a significant amount of information to Plaintiff, including hundreds of pages of payroll records, time data, store schedules, e-mail

correspondence, and other relevant information. The parties were scheduled to attend a settlement conference with the Magistrate on May 11, and exchanged initial settlement correspondence per Judge Kim's standing order. Based on this exchange of information, the parties continued to confer independently, in advance of the scheduled conference. After arms-length negotiations, the parties have now reached a mutually satisfactory settlement which both sides agree represents a fair and reasonable compromise of any and all of Plaintiffs' claims for alleged overtime wages.

4. When employees bring a private action against their former employer for back wages under the FLSA, and the parties present to the district court a proposed settlement, the district court may enter a stipulated judgment dismissing the case after scrutinizing the settlement to ensure that it is a fair and reasonable resolution of a *bona fide* dispute over wages under the FLSA. *See Walton v. United Consumers Club, Inc.*, 786 F.2d 303, 306 (7th Cir. 1986).

5. Submitted herewith to chambers, for *in camera* review by the Court, is the Settlement Agreement entered into between Plaintiff and Defendants, as well as a draft Order Approving Settlement. The parties respectfully request that this Settlement Agreement not become part of the record in this case.

6. The parties further jointly request that the Court approve the Settlement Agreement because it is a fair and reasonable resolution of bona fide disputes over wages under the FLSA and the IMWL.

7. In addition, parties request that the Court dismiss this case with prejudice pursuant to the terms of the Settlement Agreement.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that this Court enter an Order approving the Settlement Agreement as a fair and reasonable resolution of bona fide disputes under the FLSA and the IMWL.

Dated: May 10, 2017

YOTONDA MILTON

CIGH SERVICES, INC. and INSUREONE
INDEPENDENT INSURANCE AGENCY, LLC

By: /s/ Lorrie T. Peeters
One of Her Attorneys

By: /s/ Carol A. Poplawski
One of Their Attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 10, 2017, the foregoing *Joint Motion for Settlement Approval* was filed electronically with the Clerk of Court using the ECF system, which sent notification of such filing to:

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/s/ Lorrie T. Peeters